## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRINITY SOBER LIVING, LLC,	)
Plaintiff,	)
,	) Case No. 1:19-cv-7321
V.	)
VILLAGE OF HINSDALE, ILLINOIS,	<ul><li>Judge Robert W. Gettleman</li><li>Magistrate Judge Jeffrey Cole</li></ul>
VILLAGE OF HINSDALE, ILLINOIS,	) Wagistrate Judge Jeffrey Cole
Defendant.	)
	) CONSOLIDATED WITH:
UNITED STATES OF AMERICA,	)
Plaintiff,	)
ramum,	) Case No. 1:20-cv-6959
W.	) Case No. 1.20-cv-0939
V.	) Index Debert W. Cettlemen
VIII LACE OF HINCHALE HADIO	) Judge Robert W. Gettleman
VILLAGE OF HINSDALE, ILLINOIS,	) Magistrate Judge Jeffrey Cole
Defendant.	)

## JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiffs Trinity Sober Living LLC and the United States of America and Defendant Village of Hinsdale (collectively "the parties") hereby respectfully move for entry of the proposed Consent Decree, attached hereto, which resolves the claims and allegations contained in the United States' Complaint (Case No. 1:20-cv-6959, ECF No. 1) and Trinity Sober Living's Amended Complaint (Case No. 1:19-cv-7321, ECF No. 48). As stated in Section IX of the Decree, the parties respectfully request that the Court retain jurisdiction over this case for the purpose of enforcing the provisions and terms of this Decree.

Dated: February 1, 2023

JOHN R. LAUSCH JR. United States Attorney Northern District of Illinois

s/ Kathleen Flannery
PATRICK JOHNSON
KATHLEEN FLANNERY
Assistant United States Attorneys
United States Attorney's Office
Northern District of Illinois
219 S. Dearborn St., Fifth Floor
Chicago, IL 60604
Tel: (312) 353-5327
Kathleen.Flannery@usdoj.gov

Patrick.Johnson2@usdoj.gov

s/ Kurt Mathas (by express permission)

Kurt Mathas
Ross J. Corbett
Katherine Kyman
Winston & Strawn LLP
35 W. Wacker Drive
Chicago, IL 60601
Kmathas@winston.com
Rcorbett@winston.com
KKyman@winston.com

Counsel for Defendant Village of Hinsdale

Respectfully submitted,

KRISTEN CLARKE Assistant Attorney General Civil Rights Division

s/ Max Lapertosa
SAMEENA SHINA MAJEED
Chief
TIMOTHY MORAN
Deputy Chief
MAX LAPERTOSA
Attorney
United States Department of Justice

Housing and Civil Enforcement Section Civil Rights Division 950 Pennsylvania Ave. NW – 4CON

Washington, DC 20530 Tel: (202) 305-1077 Fax: (202) 514-1116 Max.Lapertosa@usdoj.gov

Counsel for Plaintiff United States of America

s/ Sarah Jane Hunt (by express permission)

Sarah Jane Hunt Thomas E. Kennedy, III Kennedy Hunt P.C. 4500 W. Pine Blvd. St. Louis, MO 63108 sarahjane@kennedyhuntlaw.com tkennedy@kennedyhuntlaw.com

s/ Bradley Staubus (by express permission)

Bradley K. Staubus Esposito & Staubus LLP 7055 Veterans Blvd., Unit B Burr Ridge, IL 60527 bks@eslaw500.com

Counsel for Plaintiff Trinity Sober Living, LLC